

Before the
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Chillicothe Iowa Post Office
Chillicothe, Iowa

Docket No. A2011-32

COMMENTS OF THE PUBLIC REPRESENTATIVE

(November 10, 2011)

I. SUMMMARY OF PROCEEDINGS

The Commission received an appeal for review of the closing of the Chillicothe, Iowa Post Office. The petition which was filed by Jason Van der Veer (Petitioner) is dated July 14, 2011, and was posted on the Commission's website on July 26, 2011.¹ In Order No. 775 the Commission instituted a proceeding under 39 U.S.C. 404(d)(5), designated the case as Docket No. A2011-32 to consider the Petitioner's appeal and designated the undersigned as Public Representative.²

The Petitioner raises the following issues: (1) the Postal Service failed to consider whether or not it will continue to provide a maximum degree of effective and regular postal services to the community (see 39 U.S.C. 404(d)(2)(A)(iii)); and (2) the Postal Service failed to consider the effect of the closing on the community (see 39 U.S.C. 404(d)(2)(A)(i).

¹ Petition Received from Jason Van Der Veer, Regarding the Goodwin Post Office, July 26, 2011 (Petition).

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, August 2, 2011 (Order No. 775).

The Commission's Notice designated August 10, 2011, as the date for the Postal Service to file the administrative record. On August 10, 2011, the Postal Service filed an electronic copy of the administrative record in response to Order No. 775.³

The Commission's Notice also set forth the date for the Petitioner's filing of a brief or supplemental response. The Petitioner's response was due on August 30, 2011. The Petitioner did not file an additional brief or Form 61. Comments were filed by the Postal Service on September 19, 2011.⁴ In its Comments the Postal Service states that the appeal presents two issues: (1) the effect on postal services from the discontinuance of the Chillicothe Post Office, and (2) the impact on the Chillicothe community. Comments at 1.

II. DISCUSSION

The Petitioner asserts that specific problems will result from closing the Chillicothe Post Office. He maintains that the Postal Service did not fill the position of postmaster when it became vacant. Petition at 1. He also asserts that Postal Service representatives did not consider customer concerns about the closing and the community will incur a negative financial impact. *Id.* The Petitioner does not raise additional issues in a brief or supplemental filing.

Regular and effective postal services. The Public Representative interprets the Petitioner's claim to assert that the Postal Service failed to consider the impact of the closing of the Chillicothe, Iowa Post Office on regular and effective postal services for the community. Additionally, he maintains that the loss of the office will impact the community financially. The Postal Service's administrative record provides background on the Chillicothe Post Office. A review of the administrative record shows that the Postal Service initiated the discontinuance study on February 15, 2011. AR Item No. 1 at 1. The initial discontinuance study was approved and provided that the rationale for

³ United States Postal Service Notice of Filing, August 10, 2011 (Administrative Record).

⁴ United States Postal Service Comments Regarding Appeal, September 19, 2011 (Comments).

the closing was minimal workload and revenue, need for more operational efficiency and the ability of the Postal Service to provide effective and regular alternate service. *Id.*

The Postal Service states that the postmaster retired April 30, 1999, and the position remained vacant. An officer-in-charge (OIC) was appointed from a post office in the vicinity. Final Determination (FD), at 2. The Chillicothe Post Office, an EAS-53 level facility, provided service from 6:45 a.m. to 11:00 a.m., Monday through Friday and 6:45 a.m. to 9:30 a.m. on Saturday. Lobby hours were available from 6:00 a.m. to 6:00 p.m., Monday through Friday and 6:00 a.m. to 6:00 p.m. on Saturday. The Final Determination states that the Chillicothe Post Office provided 32 customers post office box service and had no delivery customers. *Id.* at 2 ¶ 4. The retail window transactions averaged 4 transactions for a total of 4 minutes of retail workload per day. The Postal Service reports that office receipts were: \$8, 423 in FY 2008, \$7, 726 in FY 2009 and \$10,120 in FY 2010.⁵ The Final Determination states that on March 11, 2011, the Postal Service distributed 48 questionnaires to “delivery customers” of the Chillicothe Post Office. *Id.* ¶ 7. This statement conflicts with its earlier statement in paragraph 4 that the Chillicothe Post Office had no delivery customers.

The Postal Service also states that questionnaires were available over the counter at the post office. *Id.* at 2. Of the questionnaires that were distributed 21 were returned and the responses were 1 favorable, 4 unfavorable, and 16 that expressed no opinion regarding the closing and use of alternate service. *Id.*

The alternate service was rural route carrier delivery and retail service under the administrative responsibility of the Ottumwa, Iowa, Post Office located seven miles away. *Id.* Retail service was also to be provided by the Kirkville Post Office located four miles away. Kirkville, the closer facility had window service hours from 8:00 a.m. to noon, Monday through Saturday. Additionally, it had 67 post office boxes available for rent. *Id.*

⁵ The Postal Service does not provide an explanation for the increased revenue during FY 2010.

Effect on Chillicothe Community. A meeting was held with Postal Service representatives and persons interested in the closing of the Chillicothe Post Office on March 28, 2011. Petitioner asserts that the Postal Service representatives did not consider the customer concerns. Petition at 1. The Postal Service reports that 16 customers attended the meeting. A Postal Service “Customer Community Meeting Analysis” of the March 28, 2011, meeting is included in the administrative record. AR Item No. 25 at 1. The Postal Service indicates in this summary that a number of issues were raised during the meeting including how customers will receive or mail packages, rural mailbox installation, address changes, availability of retail services, travel to other post offices for services, lack of concern about community needs, long lines at the alternate facility and other issues. *Id.* at 2. The Postal Service’s responses offered alternatives such as purchase of retail services including package delivery and other special services from the rural route carrier, stamps by mail program, and requirements for rural delivery service. *Id.* The meeting analysis states that customers also expressed concerns about loss of their community identity and special assistance required for seniors and persons with disabilities. Based on the characterization of the customer issues described in the Postal Service’s meeting analysis there were more unfavorable concerns brought up than favorable at the meeting.⁶ *Id.* The Postal Service responses included that it will assist in the preservation of the community identity by continuing to use the Chillicothe, IA ZIP Code, in addresses and that carriers are available to assist senior citizens and persons with disabilities with rural route service. Customer also stated that there were often long lines and below par customer service at the nearby post offices. The Postal Service stated it would address issues with lines and that customers would receive courteous and helpful service from the Kirkville or Ottumwa Post Offices. *Id.*

The record reveals that customers possibly were not satisfied with the responses provided by the Postal Service at the community meeting. However, the record

⁶ The Postal Service Customer Community Meeting Analysis document includes the words favorable or unfavorable in parenthesis after each of the topics listed as postal concerns.

supports the Postal Service's assertion that it did consider customer concerns. Additional concerns were addressed by letter to those customers who filled out questionnaires regarding the closing. Questionnaire responses indicate that customers will continue to support businesses in the community and generally shop, work and seek other services outside the immediate community. Therefore, it appears that there should be no substantial financial effect on the community that has been documented in the administrative record or by the Petitioner. The record contains the results of questionnaires and responses from the Postal Service, community meetings and responses to issues raised and shows that the Postal Service considered the community's concerns about the post office closing's effect on postal services. In conformity with 39 U.S.C. 404 (a)(2)(A)(i).

Based on a review of the administrative record and Petitioner's concerns it appears that the Postal Service can provide regular and effective postal services with the proposed alternate services for the Chillicothe community. It appears that the Postal Service has complied with consideration of whether or not it will continue to provide effective and regular postal services to the community (39 U.S.C. 404(d)(2)(A)(iii)).

Respectfully Submitted,
/s/ Cassandra L. Hicks
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